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Gun Owners of America, Inc.
8001 Forbes Place, Suite 102
Springfield, VA 22151

April 10, 2015

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Gun Owners if America, Inc.
FEC Identification Number: C90011693

Attn: Jill Sugarman, Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division

Dear Ms. Sugarman:

This letter responds to the FEC letter dated March 10, 2015 to Gun Owners of America, Inc. ('GOA') regarding GOA's January 31 Year-End FEC Form 5 report (10/1/14 through 12/31/14). I prepare required FEC Forms 5 and other reports and file them with the FEC on behalf of GOA, and have done so since 2010.

1. A 24-Hour report was filed on October 28, 2014 covering the period from 10/27/14 through 10/27/14 for an independent expenditure of \$5,727.76 for Robo calls made by Voice Broadcasting (Arlington, TX) on October 27, 2014, which was the date of public dissemination, in support of an Arkansas Senate candidate in the November 4, 2014 general election. At the time when this report was filed, I did not know there would be a charge from another vendor for list rental used in connection with the Robo calls made on October 27, 2014 in support of the same Arkansas Senate candidate. An invoice of \$1,400.51 for list rental used for the Robo calls made on October 27, 2014 was received from the vendor, Thirty Odd Six Marketing (Colorado Springs, CO), on October 30, 2014. After receiving the Thirty Odd Six Marketing invoice on October 30, 2014, an amended 24-Hour report covering the period from 10/27/14 through 10/27/14 immediately was filed on October 30, 2014 to amend the 24-Hour report filed on October 28, 2014.

2. A 24-Hour report was filed on Sunday, November 2, 2014 covering the period from 11/1/14 through 11/1/14 for: (i) an independent expenditure of \$3,500.00 for a television ad buy made by Thirty Odd Six Marketing (Colorado Springs, CO) for running a television ad on November 1, 2014, which was the date of public dissemination, in support of a Minnestota House candidate (8th CD) in the November 4, 2014 general election; and (ii) an independent expenditure of \$3,500.00 for a television ad buy made by Thirty Odd Six Marketing (Colorado Springs, CO) for running a television ad on November 1, 2014, which was the date of public dissemination, in support of a West Virginia House candidate (2nd CD) in the November 4, 2014 general election. I was told about the two television ad buys on October 31, 2014, and on that day, I inquired whether the two charges included the production costs for the two television ads, and I was told that they did.

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On Monday, November 3, 2014, I was informed that: (i) the two charges by Thirty Odd Six Marketing, as reported in the 24-Hour report filed on November 2, 2014, actually did not include the television ad production costs for the two television ads (i.e., \$1,230.00 for television ad production costs for the television ad in support of the Minnesota House candidate (8th CD), which ran on November 1, 2014, and \$650.00 for television ad production costs for the television ad in support of the West Virginia House candidate (2nd CD), which ran on November 1, 2014; and (ii) there was an additional last-minute television ad buy of \$617.65 to run the television ad in support of the Minnesota House candidate (8th CD) during a hockey game television broadcast on Saturday, November 1, 2014.

After receiving, on November 3, 2014, copies of (i) the two Thirty Odd Six Marketing invoices for the television ad production costs regarding the two television ads that ran on November 1, 2014, and (ii) the Thirty Odd Six Marketing invoice for the additional last-minute television ad buy which ran on November 1, 2014, an amended 24-Hour report covering the period from 11/1/14 through 11/1/14 immediately was filed on November 3, 2014 to amend the 24-Hour report covering the period from 11/1/14 through 11/1/14 which was filed on November 2, 2014.

The amended 24-Hour report covering the period from 11/1/14 through 11/1/14 filed on November 3, 2014 reported the following additional independent expenditures as well as the two independent expenditures reported in the original 24-Hour report covering the period from 11/1/14 through 11/1/14 filed on November 2, 2014: (i) an independent expenditure of \$1,250.00 for the television ad production costs of Thirty Odd Six Marketing regarding the television ad that ran on November 1, 2014, which was the date of public dissemination, in support of a Minnesota House candidate (8th CD) in the November 4, 2014 general election; (ii) an independent expenditure of \$650.00 for the television ad production costs of Thirty Odd Six Marketing regarding the television ad that ran on November 1, 2014, which was the date of public dissemination, in support of a West Virginia House candidate (2nd CD) in the November 4, 2014 general election; and (iii) an independent expenditure of \$617.65 for an additional television ad buy to run the television ad in support of the Minnesota House candidate (8th CD) on November 1, 2014, which was the date of public dissemination, in the November 4, 2014 general election.

I note that the independent expenditures reported in the amended 24-Hour report filed on October 30, 2014 covering the period from 10/27/14 through 10/27/14, and in the amended 24-Hour report filed on November 3, 2014 covering the period from 11/1/14 through 11/1/14, were reported correctly in the January 31 Year-End FEC Form 5 report (10/1/14 through 12/31/14), which was timely filed on January 30, 2015.

If any additional information is needed, please let me know.

Sincerely yours,

Walter J. Olson
